

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA §  
§  
v. § CRIMINAL NO. 4:18-CR-575  
§ (HUGHES)  
JACK STEPHEN PURSLEY, § FILED UNDER SEAL  
AKA STEVE PURSLEY §

**DECLARATION IN SUPPORT OF GOVERNMENT'S MOTION FOR COSTS OF  
PROSECUTION**

GRACE E. ALBINSON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, to the best of her information and belief:

1. I am a Trial Attorney in the Southern Criminal Enforcement Section of the Tax Division, United States Department of Justice, and I submit this Declaration in support of the accompanying Government's Motion for Costs of Prosecution.
2. All items and costs listed in the accompanying Bill of Costs (Attachment B) are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 13, 2020.

/s/ Grace E. Albinson  
Grace E. Albinson  
Trial Attorney  
U.S. Department of Justice  
Tax Division  
150 M Street, N.E.  
Washington, D.C. 20002  
Tel: (202) 616-3311  
Grace.E.Albinson@usdoj.gov

**Exhibit B****United States v. Jack Stephen Pursley  
Criminal No. 4:18-CR-575****Bill of Costs****I. Fees for Printed Transcripts**

Grand Jury Transcripts – \$1,152.60  
Trial Transcripts (rough daily) – \$1,300.80

**Total Transcript Fees – \$2,453.40**

**II. Fees for Witnesses and Witness Travel Expenses**

Name	Witness Fees	Transportation	Hotel	Per Diem	Taxi/Mileage	Misc. <sup>1</sup>	Total
Robert Armor	\$80.00	\$812.24	\$140.40	\$61.00	\$188.47	\$56.00	\$1338.11
Thomas Foster	\$160.00				\$ 85.64	\$30.00	\$275.64
Jon Hurt	\$ 80.00		\$255.06	\$ 61.00	\$255.20		\$651.26
Shaun Mooney	\$ 80.00				\$14.16	\$24.00	\$ 118.16
Stephen Mooney	\$160.00	\$ 510.23		\$183.00	\$106.02	\$60.00	\$1019.25
Eduard Venerabile	\$200.00	\$1704.62	\$705.70	\$274.50			\$2884.82
<b>Total</b>	<b>\$760.00</b>	<b>\$3027.09</b>	<b>\$1101.16</b>	<b>\$579.50</b>	<b>\$649.49</b>	<b>\$170.00</b>	<b>\$6287.24</b>

**III. Fees for Exemplification and Costs of Making Copies**

Exhibit Binders for Trial – \$7,126 (50% of total cost)

**IV. Other Costs****Rule 15 Deposition – Kerry Smith (two-day deposition)**

Court Reporter Appearance Fee - \$600  
Videographer Appearance Fee - \$2,850  
Video file creation - \$210  
Video file synchronization - \$665  
Original Transcript - \$1590  
Inclusion of Exhibits - \$82

---

<sup>1</sup> Comprises baggage fees and parking.

Certified Copy Transcript - \$346

Travel expenses for court reporter and videographer - \$2500

**Total - \$8,843**

**Total Costs - \$24,709.64**